

IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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PLATINUM PARTNERS VALUE ARBITRAGE FUND L.P. Chapter 15  
(IN OFFICIAL LIQUIDATION), et al.,

Debtors in Foreign Proceedings. Case No. 16-12925 (JPM)

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PLATINUM PARTNERS VALUE ARBITRAGE FUND L.P., (Jointly Administered)

Plaintiff,

Adv. Pro. No. 18-01650

-vs-

**PROPOSED  
ORDER**

MICHAEL M. GOLDBERG,

Defendant.

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The Parties, having appeared at a Status Conference (via Zoom) on March 2, 2023, at 11 a.m., have agreed to the following Schedule:

1. Plaintiff shall e-file any Opposition Papers to Defendant's Motion for Modification by March 17, 2023. Defendant shall e-file any Reply Papers by March 31, 2023.
2. Each Party shall serve by email Discovery Requests concerning damages by March 17, 2023.
3. Plaintiff shall serve by email its expert's report(s) by May 5, 2023. Defendant shall serve by email any rebuttal expert's report(s) by June 30, 2023.
4. Expert depositions shall be completed no later than September 30, 2023.

Dated: New York, New York

March 2, 2023

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Hon. John P. Mastando III